

### **REMARKS**

Reconsideration of this Application is respectfully requested.

Claims 1, and 3-16 are pending in the application, with claims 1, 10, and 16 being the independent claims.

Based on the above amendments and following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

#### ***Rejections under 35 U.S.C. § 101***

In the Action on page 3, sections 5-6, claims 9 and 15 are rejected as being allegedly drawn to non-statutory subject matter because the description of “computer readable medium” in the specification includes the example of a carrier wave. Applicants respectfully disagree that a carrier wave is non-statutory subject matter. However, in the interest of advancing prosecution at this time, Applicants have amended the specification to remove “carrier wave” as an exemplar of a computer readable medium, without prejudice or disclaimer. Applicants reserve the right to reclaim the example at a future date when a decision as to the statutory nature of a carrier wave has been made by the courts or Congress.

#### ***Rejections under 35 U.S.C. § 102***

In the Action on pages 3-4, sections 8-10, claims 10 and 13-16 are rejected as being anticipated by “OASIS Security Services Technical Committee SAML Issues List” by Hal Lockhart (hereinafter “Lockhart”). Applicants respectfully traverse the rejection.

As amended, claims 10 recites: A method for secure mutual authentication comprising the steps of: receiving at a second web site an authentication message for a customer from a first web site, said customer previously authenticated by said first web site, said authentication message generated by said first web site, said authentication message devoid of intelligent information of said customer and comprising a permanent customer pseudonym that uniquely identifies said customer and is devoid of intelligent information of said customer, ***wherein said customer has not accessed said second web site prior to said receiving said authentication message at said second***

**web site**; and authenticating said customer at said second web site using said authentication message generated by said first web site; wherein said first web site is independent of said second web site.

As amended, claim 16 recites: A computer system for secure mutual authentication comprising a first web site and a second web site, wherein said first web site is independent of said second web site; said first web site to: authenticate a customer, *after said authentication, receive a selection from said customer requiring transfer to said second web site*, after receiving said selection, generate an authentication message, and after generating said authentication message, transfer said authentication message from said first web site to said second web site, said authentication message devoid of intelligent information of said customer and comprising a permanent customer pseudonym that uniquely identifies said customer and is devoid of intelligent information of said customer; and said second web site to receive said authentication message for said customer from said first web site and authenticate said customer using said authentication message generated by said first web site.

Lockhart teaches, generally, a user going directly to a destination web site without first being authenticated at a source web site. The destination web site redirects the user to the user's home security domain, or source web site, for authentication. Lockhart, page 13 "First Contact". The source web site then authenticates the user and provides an authentication reference, or name assertion reference, and redirects the user to the destination web site with the authentication reference. The destination web site next requests the authentication document from the source web site, and the source web site provides the authentication document to the destination web site, which, in response, provides the resource to the user. Lockhart, page 14. Lockhart fails to teach at least four elements of claims 10 and 16.

First, Lockhart fails to teach either "wherein said customer does not access said second web site prior to said receiving said authentication message at said second web site" from claim 10, or "after authentication, receiving a selection from said customer at said **first** web site requiring transfer to a second web site" from claim 16. Instead, Lockhart teaches the user initially going directly to the second web site (i.e., the destination web site of Lockhart), *then* being returned to the first web site (i.e. the source web site of Lockhart) for authentication. In contrast, in claims 10 and

16, the user *first* authenticates at a first web site, and *then* makes a selection requiring transfer to a second web site.

Second, Lockhart fails to teach after receiving said selection, generating an authentication message for said customer at said first web site, *said authentication message devoid of intelligent information of said customer and comprising a permanent customer pseudonym* that uniquely identifies said customer and is devoid of intelligent information of said customer. Instead, Lockhart teaches that a source web site provides a user with an authentication reference, or “name assertion reference.” Lockhart, p. 14, step 4. As is known to those skilled in the art, a SAML “name assertion reference” is essentially a reference to a document that conveys information about the authentication. Lockhart, p. 14, step 7. An authentication assertion in SAML is a statement that a specified subject was authenticated by a particular means at a particular time. A name assertion, name assertion reference, or authentication assertion does not contain a customer pseudonym. Instead, these assertions state that the user was authenticated. The authentication document may, in fact contain “authorization attributes,” which are attributes of a principal that are used to make authorization decisions, e.g. an identifier, or group or role membership. Lockhart, p. 16.

Third, Lockhart fails to teach a permanent customer pseudonym that uniquely identifies a customer and is devoid of intelligent information of said customer. While Lockhart uses the term “pseudonym”, this pseudonym is “an attribute in an assertion that identifies the principal, but is not the identifier used in the principal’s home domain.” Lockhart, page 15. There is no requirement that the attribute or the pseudonym be devoid of intelligent information of the customer, merely that it be different from the identifier used in the home domain. There is also no teaching in Lockhart that the attribute and/or pseudonym be permanent. Further, Lockhart appears to teach a pseudonym having intelligent information: “At an implementation level AND at a specification level, I can’t see how a pseudonym should differ from a ‘real’ name.” Lockhart, page 15. In contrast, as disclosed in the specification, the customer pseudonym of claim 1 is unique for a specific customer from a specific site. In operation, the same customer pseudonym could be generated by different partner sites and still be valid. See, e.g., specification, page 9, lines 17-18.

Fourth, Lockhart fails to teach after generating said authentication message, transferring said authentication message from said first web site to said second web site for authentication of said

customer by said second web site. Instead, Lockhart teaches an authentication *reference* transferred from a first web site (i.e., the source web site of Lockhart) to the second web site, which causes the second web site to request an authentication *document* from the first web site. In response to the request, the first web site transfers the authentication document to the second web site. If, *arguendo*, the authentication reference of Lockhart is the same as the authentication message of claim 1, then the authentication reference of Lockhart is not sufficient for the second web site to authenticate.

Lockhart therefore fails to teach at least four elements of claims 10 and 16, and Applicants respectfully assert that claim 16 is not anticipated by Lockhart and request that the rejection be withdrawn and the claim allowed.

Claims 13-15 depend from claim 10 and are allowable as being dependent from an allowable claim.

### ***Rejections under 35 U.S.C. § 103***

In the Action on pages 5-6, sections 13-15, claims 1, 3, and 7-9 are rejected as being unpatentable over Lockhart in view of WO-01/88733 A1 to Lefler et al. (hereinafter "Lefler"). Applicants respectfully traverse the rejection.

As stated in the Action, Lockhart fails to teach, at least, after authentication receiving a selection, after receiving the selection generating an authentication message, and after generating the authentication message transferring the message in the order claimed in claim 1. Applicants agree. In addition, Lockhart further fails to teach a customer pseudonym, as discussed above.

Further, Lefler, alone or in combination with Lockhart, fails to overcome the deficiencies of Lockhart with respect to claim 1.

Lefler generally teaches a centralized system where a user authenticates once, either to a central hub or to a hub participant's website, and then can access content from the other hub participants' web sites without having to authenticate at each participant. Lefler, Abstract. The system in Lefler cross-references a user to the user's accounts at multiple hub participants in a master list at the hub, using data such as name, email address, and mailing address. The hub

participants provide information about their users to the hub, where the information has “a sufficient number of attributes to uniquely identify the user.” Lefler, page 15, lines 1-17.

Lefler fails to teach generating an authentication message devoid of intelligent information of said customer. Instead, Lefler teaches a “cooked URL” (CURL) that is generated when a user attempts to access a second website from a first website. Lefler, page 23, line 11. A CURL is a formatted string that identifies the user’s identity, for example with a name, location, user attributes or social security number. Lefler, p. 24, lines 9-13.

Lefler also fails to teach a permanent customer pseudonym that uniquely identifies said customer and is devoid of intelligent information of said customer. Lefler instead transmits a user’s authentication information to the second website from the hub. Lefler, p. 17, lines 15-17.

The combination of Lockhart and Lefler fails to teach, at least, generating an authentication message devoid of intelligent information of said customer, and a permanent customer pseudonym that uniquely identifies said customer and is devoid of intelligent information of said customer.

Further, one would not be motivated to combine the references to obtain the claimed invention, because Lefler, in particular, teaches away from one of the premises of the invention, that is, preventing the transmission of identifying intelligent information about a customer. Lefler collects many different kinds of intelligent information, as described above, and transmits, at least a user’s authentication information to the participant websites.

Therefore, the combination of Lockhart and Lefler fail to teach or suggest the claimed invention. Applicants respectfully request that the rejection be withdrawn and the claims be allowed.

Claims 3 and 7-9 depend from claim 1, and are allowable at least for being dependent from an allowable claim.

In the Action on pages 6-7, sections 16-17, claims 4-6 are rejected as being unpatentable over Lockhart in view of Lefler and in further view of Le Berre. Applicants respectfully traverse the rejection. Claims 4-6 depend from claim 1, and are allowable at least for being dependent from an allowable claim.

In the Action on pages 7-8, sections 18-19, claims 11 and 12 are rejected as being unpatentable over Lockhart in view of Le Berre. Applicants respectfully traverse the rejection. Claims 11-12 depend from claim 10, and are allowable at least for being dependent from an allowable claim.

Le Berre, alone or in combination with Lockhart and Lefler, fails to overcome the deficiencies of Lockhart and Lefler with respect to the independent claims. Applicants have previously argued that Le Berre fails to teach or suggest, at least, generating an authentication message devoid of intelligent information of said customer, and a permanent customer pseudonym that uniquely identifies said customer and is devoid of intelligent information of said customer.

Therefore, the Action has failed to set forth a prima facie case of obviousness regarding any of the pending claims, and Applicants respectfully request that the rejections be withdrawn.

***Conclusion***

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

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Respectfully submitted,

By 

Caroline J. Swindell

Registration No.: 56,784

VENABLE LLP

P.O. Box 34385

Washington, DC 20043-9998

(202) 344-4000

(202) 344-8300 (Fax)

Attorney/Agent For Applicant